

EXHIBIT A

Deposition Transcripts

<u>Deponent</u>	<u>Use at Trial</u>	<u>Costs</u>
Dr. Denise Maratea	On cross examination by Plaintiff (Day 6)	\$592.38
Dr. Clement Woghiren	On cross examination by Defendant (Day 3)	\$854.40
Christopher Pajak	Trial Exhibit 45 ¹	\$675.25
	TOTAL	\$2,122.03

¹ On Day 6 of trial, Defendants introduced Trial Exhibit 45 (e-mail from Dr. Denise Maratea to Christopher Pajak). Said Exhibit was initially produced as Exhibit 2 to Christopher Pajak's deposition. (*See Deposition of Christopher Pajak*, September 2, 2005 at 113/5-114/1, attached.) Because this document was used at trial, Christopher Pajak's deposition was "necessarily obtained for use in the case." 28 U.S.C.A. § 1920.

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

* * * * *

CLEMENT WOGHIREN,
Plaintiff,

v. Civil Action
No. 04-12148 WGY

WYETH and
WYETH BIOPHARMA,
Defendant.

* * * * *

30(b)(6) Deposition of **CHRISTOPHER PAJAK**, taken on behalf of the Plaintiff, pursuant to Notice under the applicable Rules of the Federal Rules of Civil Procedure, before Rochelle D. Baron, a Professional Shorthand Reporter and Notary Public in and for the Commonwealth of Massachusetts, at the Offices of Tocci, Goss & Lee, P.C., 35 India Street, Boston, Massachusetts on Monday, September 12, 2005, commencing at 9:35 a.m.

JOAN R. DUNNE COURT REPORTING SERVICE
28 SONNING ROAD
BEVERLY, MASSACHUSETTS 01915
(978) 927-2678

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1 surrounding -- I'm not sure whether
2 this was part of your -- it may have
been -- and this is an extra copy.

[Witness looking at document.]

5 Q Can you identify that document?

6 A Yes.

7 Q And just generally tell me what that
8 document is.

9 A This is a document -- an e-mail from
10 Dr. Maratea to myself indicating that
11 she had solicited feedback from Tom
12 Porter, who is in development
13 organization, regarding Clement --
14 regarding Dr. Woghiren.

15 MR. TOCCI: Why don't we mark
16 this as an exhibit.

17 [A copy of an
18 e-mail dated
19 6/11/2004 to
20 Christopher Pajak
21 from Denny Maratea
22 was marked as
23 Pajak Exhibit No.
24 2 for

114

1 identification.]

2 Q Okay. Did you ask Dr. Maratea to
3 provide you with the information in
4 this memo?

5 A Yes.

6 Q Okay. Why did you ask her to gather
7 this information?

8 A Uhm, it was right around the time of
9 Dr. Woghiren's or our hearing with the
10 MCAD. I don't remember the exact date
11 of that. So this is either just prior
12 to or just after the date. Could we
13 confirm that date of the MCAD hearing?

14 MR. FITZHUGH: Off the record.

15 [Discussion off the record.]

16 MR. FITZHUGH: We're back on.

17 A So if my memory serves me correctly,
18 Dr. Woghiren at some point that he had
19 indicated that he received positive
feedback from other peers in other
organizations regarding his performance,
22 particularly regarding his performance
23 review, and he had provided names of
24 people for Dr. Maratea to solicit

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1 feedback from regarding his performance.
2 I asked if she ever did solicit
3 feedback from those people, Tom being
4 one of them, Tom Porter, who's
5 referenced in this e-mail. She had
6 indicated to me that she did, and I
7 asked, well, did you get anything
8 formal from them, was it just general
9 feedback and so forth. So this, I
10 believe, is representative of her
11 either notes or recollection of the
12 feedback that she received from Tom,
13 and she provided it to me.

14 Q Okay. Is it fair to say that at least
15 from January 2004 till his termination,
16 that from the documents you've seen and
17 the conversations you've had with
18 Dr. Maratea, that she very carefully
19 monitored and documented performance
20 problems with Clem Woghiren?

21 A I think she did her job as manager and
22 documented it -- his performance and so
23 forth, as I would have recommended that
24 she do for anyone.

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1 Q Is it fair to say he's been placed
2 under a microscope by January of 2004,
3 is that correct?

4 A No. I don't think that's an accurate
5 assessment.

6 Q Have you had a chance to see Dr. Woghiren's
7 notes or typed notes?

8 MR. FITZHUGH: You mean
9 Dr. Maratea?

10 Q I'm sorry. Dr. Maratea's typed notes?

11 A Pretty much her entire period of
12 employment.

13 Q Well, she has some handwriting notes,
14 and then she has a memo.

15 A Yes. I've seen.

16 MR. FITZHUGH: Off the record.

17 [Discussion off the record.]

18 MR. FITZHUGH: So 27.

19 A These are documents summarizing the
20 meetings Dr. Maratea had, which I was
21 also present for many of them.

22 Q Not the first couple of pages. The
23 first couple of pages are meetings,
24 correct, meetings that occurred during

INVOICE

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S.S.# 102-32-8801

6831
12/14/05
AC

Date: September 15, 2005

DEPOSITION - SEPTEMBER 8, 2005

DR. DENISE MARATEA

Copy of transcript - 149 pages @ \$2.75 p.p.:
E-mail Transcript:
Expedite Fee 25%:
Postage:

\$409.75
75.00
102.43
5.20
\$592.38

CLEMENT WOGHIREN
VS.

WYETH and WYETH BIOPHARMA

TOTAL DUE:

\$592.38

Dr. Denise Maratea

ENTERED SEP 23 2005

KMM Reporting Service

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I N V O I C E

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Attn: Michael A. Fitzhugh, Esq.

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Job Date	Reporter	Case Name (Witness)	Description	Pages	Rate	Amount	Total
9/9/05	KMM	Woghiren vs. Wyeth	Org. Transcript	267	\$3.20	\$854.40	\$854.40
		Deposition of Clement Woghiren	Condensed/Ind.	Yes		N/C	N/C
			ASCII	Yes		N/C	N/c
			Copy Transcript				
			Condensed				
			ASCII				

NOTE: Transcript e-mailed 9/18/05
Transcript delivered 9/19/05

Subtotal	\$854.40
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Balance Due	\$854.40

6832
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INVOICE

Rochelle Baron

No. 8121

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APPROVED *mf*

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CHRISTOPHER PAJAK

30(b) (6) DEPOSITION - SEPTEMBER 12, 2005

\$407.00
203.50
30.00
30.00
4.75
\$675.25

Copy of transcript 148 pages @ \$2.75 p.p.:
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CLEMENT WOGHIREN

VS.

WYETH AND WYETH BIOPHARMA

TOTAL DUE: \$675.25

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